

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

MARC VEASEY, *et al.*,

Plaintiffs,

VS.

RICK PERRY, *et al.*,

Defendants.

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CIVIL ACTION NO. 2:13-CV-00193

EXHIBIT G

Wolf, Lindsey

From: Rosenberg, Ezra <ezra.rosenberg@dechert.com>
Sent: Thursday, August 07, 2014 2:05 PM
To: Scott, John; Whitley, David; Clay, Reed; Wolf, Lindsey; Westfall, Elizabeth (CRT); Baldwin, Anna (CRT); Daniel Freeman; Richard Dellheim; Jennifer Maranzano; Mr. Bruce Gear Esq.; King, Ryan (CRT); All Corpus Christi Section 2 Case Group
Subject: Expert Depositions

John – We appreciate your willingness to consider alternatives to deposition location so as to ease the burdens (and costs) on attorneys and experts alike. Following is a schedule of the depositions of experts that the plaintiffs would prefer not be held in Texas. (These include deposition dates for your experts.) We have suggested that most of these be held in DC, or alternatively by phone. For any of DOJ's experts deposed in DC, DOJ will not request costs. Other Plaintiffs and Plaintiff-Intervenors are open to discussing that possibility.

Because of scheduling problems, Dr. Minnite's deposition would be highly preferred to be telephonic. In addition, because Dr. Chatman is in Berkeley, and Drs. Barreto and Sanchez are available in Seattle, a telephonic deposition would, again, be the preferred vehicle. Additionally, while we understand that Dr. Burton is available on August 14th in Austin, plaintiffs would prefer that his be held by telephone, if the State is amenable. We are amenable to any of the depositions of our experts occurring telephonically. So, our proposal (excluding those other experts who are Texas based) is:

August 14:
Telephone: Minnite
Austin, or phone: Burton

August 15:
DC: Bazelon -- Please note that Dr. Bazelon will be issuing a Reply Report on the 15th, so the State may wish to delay his deposition until afterwards. Alternative dates are provided for the 25th or 26th below.

August 18:
DC: Henrici
DC: Webster

August 19:
DC: Davidson
DC: Ghitza
Berkeley/telephone alternative for Chatman (If Dr. Chatman is deposed in Berkeley or by telephone, he can be available virtually any day that week, so that is one we suggest you consider be done telephonically).

August 20:
DC: Burden
DC: Herron
Seattle: Gabe Sanchez
DC/Berkeley/telephone: Chatman

August 21:
Seattle: Matt Barreto (Again, we would suggest you consider telephonic depositions for Drs. Sanchez and Barreto).
DC/Berkeley/telephone: Chatman

August 22:

DC: Ansolabehere

DC: Lichtman

Berkeley/telephone alternative for Chatman

August 25:

DC: Hood

DC: Alternative for Bazelon

August 26:

DC: Milyo

DC: Alternative for Bazelon

Please let me know if you would like to set up a call sometime tomorrow morning to discuss. Thanks. - Ezra

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